

UNITED STATES BANKRUPTCY COURT  
for the Eastern District of Pennsylvania

:  
In re : Case No. 22 - 11818  
Keith M. Scriven : (Chapter 11)  
Debtor. :  
: Hon. Ashely M. Chan  
:

**Debtor's Objection to Proposed Order**

AND NOW, comes Debtor, Keith M. Scriven, by and through his attorney, Ronald G. McNeil, Esquire, hereby objects to the proposed Order filed by Ajax Mortgage (“Ajax”) [ECF # 102], and, in support thereof, states as follows:

1. Ajax did not submit this proposed Order to Debtor’s counsel before its filing.
2. Paragraph # 2 of this proposed Order goes beyond the terms of the August 22, 2022 Stipulation Order.
3. Paragraph # 3 of this proposed Order is not a provision within the terms of the August 22, 2022 Stipulation Order.
4. Paragraph # 4 of this proposed Order is not a provision within the terms of the August 22, 2022 Stipulation Order.
5. The terms of the August 22, 2022 Stipulation Order provide Ajax with the appropriate relief it is seeking.
6. After the filing of this proposed Order, Debtor’s counsel has been in communication with Ajax’s counsel.

WHEREFORE, Debtor respectfully requests that Honorable Court to disregard this proposed Order and to order such other and further relief as is just and proper.

Respectfully submitted,

/s/ Ronald G. McNeil

Ronald G. McNeil, Esquire  
Attorney for Debtor  
DATE: March 10, 2023  
1333 Race Street  
Philadelphia, PA 19107-1585  
(215) 564 - 3999 (t)  
(215) 564 - 3537 (fx)  
[r.mcneil@verizon.net](mailto:r.mcneil@verizon.net)

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**CERTIFICATE OF SERVICE**

I, Ronald G. McNeil, Esquire, certify that a true and correct copy of Debtor's Objection to Proposed Order was served via electronic means upon the following:

Ajax Mortgage Loan Trust, a/k/a,  
c/o Manley Deas Kochalski LLC  
ATTN: Adam B. Hall, Esquire  
Alyk L. Oflazian, Esquire  
P.O. Box 165028  
Columbus, OH 43216-5028

SubChapter V Trustee  
Furtek & Associates, LLC  
Richard E. Furtek, CPA  
101 Lindenwood Drive, Suite 225  
Malvern, PA 19355-1762

Office of the U.S. Trustee  
ATTN: George M. Conway, Esquire  
Robert N.C. Nix, Sr. Federal Bldg  
900 Market Street, Suite 320  
Philadelphia, PA 19107

/s/ Ronald G. McNeil  
Ronald G. McNeil, Esquire  
Attorney for Debtor  
DATE: March 10, 2023